

REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-44 are pending in this application.

35 U.S.C. § 101

Claims 1, 2, 6-8, 20-22, 29, 30, and 33-43 stand rejected under 35 U.S.C.

§101. Applicant respectfully disagrees.

In the February 28, 2006 Office Action, it was asserted that, with regard to claims 1, 20, and 29:

Based on the claim language, it appears that applicant has written the claims in such a manner as to attempt to cover each and every substantial practical application of the idea of including in a set of objects additional objects which are affiliated with a subset of the objects so as to, in practical effect, be claiming the abstract idea itself.

Applicant respectfully disagrees and submits that claims 1, 20, and 29 as originally written, and as amended, are directed to statutory subject matter. Claim 1 refers to objects but is not limited to any particular type of object. Applicant respectfully submits that simply broadly referring to objects does not make the claim nonstatutory. Additionally, as amended, claim 1 refers to objects that are referenced by at least a threshold number of other objects. For at least these reasons, Applicant respectfully submits that claim 1 is directed to statutory subject matter.

With respect to claims 20 and 29, Applicant respectfully submits that claims 20 and 29 are directed to statutory subject matter for reasons similar to those discussed above with respect to claim 1. With respect to claims 2, 6-8, 21-

22, and 30, claims 2 and 6-8 depend from claim 1, claims 21-22 depend from claim 20, and claim 30 depends from claim 29. Accordingly, Applicant respectfully submits that claims 2, 6-8, 21-22, and 30 are directed to statutory subject matter for at least the reasons discussed above with respect to their respective base claims.

With respect to claim 33, claim 33 has been amended to clarify that the system is implemented at least in part in a computing device. For at least these reasons, Applicant respectfully submits that claim 33 is directed to statutory subject matter. With respect to claims 34-37, given that claims 34-37 depend from claim 33, Applicant respectfully submits that claims 34-37 are directed to statutory subject matter for at least the reasons discussed above with respect to claim 33.

In the February 28, 2006 Office Action, it was asserted that, with regard to claim 38:

Claims 38 is rejected under 35 U.S.C. 101 because it appears to be directed to an abstract idea rather than a practical application of the idea. The result of "identifying" something does not appear to be a tangible result.

Applicant respectfully disagrees and submits that claim 38 as originally written, and as amended, is directed to statutory subject matter. Claim 38 refers to objects but is not limited to any particular type of object. Applicant respectfully submits that simply broadly referring to objects does not make the claim nonstatutory. Additionally, as amended, claim 38 refers to objects of the second collection that are grouped in a particular one of the concentric portions have a same rank. For at least these reasons, Applicant respectfully submits that claim 38 is directed to statutory subject matter.

With respect to claims 39-43, given that claims 39-43 depend from claim 38, Applicant respectfully submits that claims 39-43 are directed to statutory subject matter for at least the reasons discussed above with respect to claim 38.

Thus, for at least these reasons, Applicant respectfully submits that claims 1, 2, 6-8, 20-22, 29, 30, and 33-43 comply with 35 U.S.C. §101.

Applicant respectfully requests that the §101 rejections be withdrawn.

35 U.S.C. § 102

Claims 1-15, 18-27, and 29-37 stand rejected under 35 U.S.C. §102(b) as being unpatentable over U.S. Patent No. 6,457,028 to Pitkow et al. (hereinafter "Pitkow"). Applicant respectfully submits that claims 1-15, 18-27, and 29-37 are not anticipated by Pitkow.

Pitkow is directed to analysis of linked collections of documents (see, col. 1, lines 15-16). As discussed in the Abstract of Pitkow, the links from a set of related documents are analyzed to identify a plurality of document collections. By analyzing only the link structure, a process intensive content analysis of the documents is avoided. A citation analysis technique, such as co-citation analysis, is performed on the set of documents to extract link information indicating links and link frequency between document collections. For co-citation analysis that information would include the frequency that both are linked to by another document collection. By using the link information, related document collections may then be identified using a suitable analysis technique, such as clustering or spreading activation.

In contrast, with respect to amended claim 1, amended claim 1 recites:

A computerized method comprising:
identifying, from a plurality of objects, a set of core objects
for a community of objects by identifying one or more objects that
are referenced by at least a threshold number of other objects of the
plurality of objects; and
expanding, based on the set of core objects, the community of
objects to include a set of affiliated objects.

Applicant respectfully submits that no such identifying and expanding is disclosed in Pitkow.

In the February 28, 2006 Office Action at p. 3, Pitkow at col. 3 lines 1-5 and col. 5 lines 54-58 is cited as teaching the identifying of claim 1, and Pitkow at col. 3 lines 5-12, col. 5 lines 54-61, and col. 7 lines 8-10 is cited as teaching the expanding of claim 1. Applicant respectfully disagrees. Pitkow at col. 3 lines 1-12 is the Summary of the Invention, and reads as follows:

A method and apparatus for identifying collections of linked documents is disclosed. In the method the links from a set of related documents are analyzed to identify a plurality of document collections. By analyzing only the link structure, a process intensive content analysis of the documents is avoided. A citation analysis technique, such as co-citation analysis, is performed on the set of documents to extract link information indicating links and link frequency between document collections. For co-citation analysis that information would include the frequency that both are linked to by another document collection.

Furthermore, Pitkow at col. 5 lines 54-61 reads as follows:

For all documents in the index, the number of times a document was cited is computed and those documents whose cited frequency falls above a specific threshold are kept for further processing. This prefiltering retains the most important (or at least the most popular) documents. Next, the extracted documents are sorted and all pairs of documents that have been cited together by the same source document are formed.

Thus, it can be seen that in these cited portions of Pitkow, the documents are prefiltered based on the specific threshold and those whose cited frequency falls above a specific threshold are kept for further processing. Those documents are then sorted. However, nowhere is there any discussion or mention of **expanding** an identified community of objects that were identified as recited in amended claim 1. Pitkow discusses sorting the extracted documents, not expanding the group of extracted documents. Without any discussion or mention of expanding an identified community of objects that were identified as recited in amended claim 1, Applicant respectfully submits that Pitkow cannot disclose the identifying and expanding of amended claim 1.

For at least these reasons, Applicant respectfully submits that amended claim 1 is allowable over Pitkow.

With respect to claims 2-15 and 18-19, given that claims 2-15 and 18-19 depend from amended claim 1, Applicant respectfully submits that claims 2-15 and 18-19 are likewise allowable over Pitkow for at least the reasons discussed above with respect to amended claim 1.

With respect to amended claim 20, Applicant respectfully submits that, similar to the discussion above regarding amended claim 1, Pitkow does not disclose to identify, from a plurality of objects, a first collection of objects to be a core of a community by identifying one or more objects that are referenced by at least a threshold number of other objects of the plurality of objects, and further to identify and add a second collection of objects to the community as recited in amended claim 20. For at least these reasons, Applicant respectfully submits that amended claim 20 is allowable over Pitkow.

With respect to claims 21-27, given that claims 21-27 depend from amended claim 20, Applicant respectfully submits that claims 21-27 are likewise allowable over Pitkow for at least the reasons discussed above with respect to amended claim 20.

With respect to amended claim 29, Applicant respectfully submits that, similar to the discussion above regarding amended claim 1, Pitkow does not disclose to identify, from the plurality of objects, one or more core object sets from the plurality of objects by identifying one or more objects that are referenced by at least a threshold number of other objects of the plurality of objects, wherein each core object set is a core of a community, and for each of the core object sets, expand the community to include a set of affiliated objects, wherein the expansion is based on the core object set of the community as recited in amended claim 29. For at least these reasons, Applicant respectfully submits that amended claim 29 is allowable over Pitkow.

With respect to claims 30-32, given that claims 30-32 depend from amended claim 29, Applicant respectfully submits that claims 30-32 are likewise allowable over Pitkow for at least the reasons discussed above with respect to amended claim 29.

With respect to claim 33, Applicant respectfully submits that, similar to the discussion above regarding amended claim 1, Pitkow does not disclose a core set identification module to identify core sets of objects for communities from a plurality of objects by identifying one or more objects that are referenced by at least a threshold number of other objects of the plurality of objects, and a community expansion module to expand communities by adding affiliated objects

to the communities, wherein the expansion of a community is based at least in part on the core set of objects of the community and links from objects of the plurality of objects to the core set of objects of the community as recited in amended claim 33. For at least these reasons, Applicant respectfully submits that amended claim 33 is allowable over Pitkow.

With respect to claims 34-37, given that claims 34-37 depend from amended claim 33, Applicant respectfully submits that claims 34-37 are likewise allowable over Pitkow for at least the reasons discussed above with respect to amended claim 33.

Applicant respectfully requests that the §102 rejections be withdrawn.

35 U.S.C. § 103

Claims 16-17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Pitkow in view of U.S. Patent Application Publication No. 2006/0031246 to Grayson (hereinafter "Grayson"). Grayson was filed July 25, 2005, and references Provisional Application No. 60/599,191, filed August 4, 2004. The present application was filed July 22, 2003, prior to the filing date of Grayson and prior to the filing date of the Provisional Application referenced in Grayson. Accordingly, Applicant respectfully submits that Grayson is not a useable prior art reference, and respectfully submits that claims 16-17 are allowable over Pitkow in view of Grayson.

Claims 28 and 38-44 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Pitkow in view of U.S. Patent Application Publication No. 2002/0152222 to Holbrook (hereinafter "Holbrook"). Applicant respectfully

submits that claims 28 and 38-44 are not obvious over Pitkow in view of Holbrook.

Holbrook is directed to database searching and the presentation of aggregate data base search results by an intuitive graphical user interface (see, ¶ 3). As discussed at ¶ 18, Holbrook presents a three dimensional graphical user interface (GUI) that enables the navigation of an unstructured list of data elements; e.g., search results of a database. Holbrook has the following features: (a) the data elements are classified within the leaf-nodes or intermediate nodes of a hierarchical category node tree; e.g., a library structure; (b) the engine for building the GUI utilizes only the two attributes per data element: (i) a text string indicating the category path, and (ii) a URL for accessing the data element, an optional data element description or excerpt (e.g., JPEG, MPEG, or audio) may also be included; (c) Holbrook enables implementation of a simple API utilizing the aforementioned two GUI attributes. The GUI engine operates independently of the library structure associated with the accessed database; (d) the GUI displays one hierarchical level at a time; (e) all aggregate data elements for a displayed category are presented with paths that are implied, i.e., data element paths not expressly presented however, can optionally be presented; each level displays all matching sibling category nodes; and (g) any displayed category node can be "drilled-down" to the next lower hierarchical level of the category tree or "drilled out" to immediately access a data element.

With respect to claim 28, claim 28 depends from amended claim 20, and Applicant respectfully submits that claim 28 is allowable over Pitkow for at least the reasons discussed above with respect to amended claim 20. With respect to

Holbrook, Holbrook is not cited as curing, and does not cure, the deficiencies of Pitkow discussed above with respect to amended claim 20. For at least these reasons, Applicant respectfully submits that amended claim 28 is allowable over Pitkow in view of Holbrook.

With respect to amended claim 38, amended claim 38 recites:

A method comprising:
grouping a first collection of a plurality of objects into a center portion;
grouping a second collection of the plurality of objects into a plurality of concentric portions around the center portion so that all objects of the second collection that are grouped in a particular one of the concentric portions have a same rank; and
identifying, as the community of objects, the groupings of the first and second collections of the objects.

Applicant respectfully submits that no such method is disclosed or suggested by Pitkow in view of Holbrook.

In Holbrook, each matching web site for a search request is represented by a bulb-like category member icon having the web site's relative rank number depicted therein (see, Fig. 4 and ¶ 76). Each depicted web site is shown as being a member of the parent category within which it belongs (see, Fig. 4 and ¶ 77). As can be seen in Fig. 4 of Holbrook, depicted web sites 402 are arranged in a circle of the parent category 420. However, these different web sites are labeled with their relative rank number, and web sites having different ranks are included in the same circle. Accordingly, Applicant respectfully submits that Holbrook cannot disclose or suggest grouping a second collection of the plurality of objects into a plurality of concentric portions around the center portion so that all objects of the second collection that are grouped in a particular one of the concentric portions have a same rank as recited in amended claim 38.

With respect to Pitkow, Pitkow is not cited as curing and does not cure these deficiencies of Holbrook. For at least these reasons, Applicant respectfully submits that amended claim 38 is allowable over Pitkow in view of Holbrook.

With respect to claims 39-43, given that claims 39-43 depend from amended claim 38, Applicant respectfully submits that claims 39-43 are likewise allowable over Pitkow in view of Holbrook for at least the reasons discussed above with respect to amended claim 38.

With respect to amended claim 44, Applicant respectfully submits that, similar to the discussion above regarding amended claim 38, Pitkow in view of Holbrook does not disclose or suggest assigning a group of affiliated objects of the community to a plurality of circles of the set of concentric circles, wherein the plurality of circles surround the center circle, and wherein all of the objects of the group of affiliated objects having a same rank are assigned to a same one of the set of concentric circles as recited in amended claim 44. For at least these reasons, Applicant respectfully submits that amended claim 44 is allowable over Pitkow in view of Holbrook.

Applicant respectfully requests that the §103 rejections be withdrawn.

Conclusion

Claims 1-44 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. Should any matter in this case remain unresolved, the undersigned attorney respectfully requests a telephone conference with the Examiner to resolve any such outstanding matter.

Respectfully Submitted,

Date: 5/30/06

By: 

Allan T. Sponseller
Reg. No. 38,318
(509) 324-9256